

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

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| IN RE: | § | CASE NO. 16-10150 |
| RIO MOBILE HOME AND R.V. PARKS, INC. | § | |
| DEBTOR | § | CHAPTER 11 |

DEBTOR'S EXPEDITED MOTION TO EXTEND DEADLINE FOR DEBTOR TO FILE A
LIQUIDATING PLAN
WITH REQUEST FOR TELEPHONIC HEARING ON JUNE 1, 2017

This motion seeks an Order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the Court may consider evidence at the Hearing and may decide the motion at the Hearing. Represented parties should act through their Attorney.

TO THE HONORABLE JUDGE OF SAID COURT:

Rio Mobile Home and R.V. Parks, Inc. ("Debtor") files this Motion to Extend Deadline for Deabtor to File a Liquidating Plan with Request for Telephonic Hearing on June 1, 2017 and would show the following:

1. On or about May 10, 2016, Debtor filed for a Chapter 11 Bankruptcy relief pursuant to the Bankruptcy Code.
2. On April 4, 2017, this Court ordered Debtor to file a liquidating plan within 60 days. Thus, the deadline is June 3, 2017.
3. The interested parties in adversary proceeding 17-01002, whose lead case is 16-10438, have recently mediated their claims and defenses and are on the cusp of a global settlement.
4. A global settlement would remove the need for Debtor to file any plan.
5. Debtor requests a short extension of 10 days to give all parties in interest an opportunity to finalize and execute any global settlement.

6. No party has objected to extending the deadline to file a plan while the parties in interest continue to hammer out the details of a global settlement.

WHEREFORE PREMISES CONSIDERED, Debtor Rio Mobile Home and R.V. Parks, Inc. prays that the Court will enter an order extending the deadline for Debtor to file a liquidating plan, and providing any other relief Debtor may be justly entitled to.

Dated: 5/31/2017

Respectfully submitted,

Law Office of Antonio Martinez, Jr., P.C.

/s/ Antonio Martinez, Jr.
Antonio Martinez, Jr.
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Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on copy of the foregoing Motion to Extend Deadline to file a Liquidating Plan with Request for Telephonic Hearing on June 1, 2017 was served on the date that the Voluntary Motion to Dismiss was filed electronically. Service was accomplished via email, ECF, U.S. Mail on the following:

U.S. Trustee
606 N. Carancahua, Suite 1107
Corpus Christi, TX 78401

Debtor(s):
Rio Mobile Home and R.V. Parks, Inc.
8801 Boca Chica Blvd.
Brownsville, TX

Barry Benton

William Kimball

Luis Hernandez

Antonio Villeda

And all creditors on attached matrix.

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/s/ Antonio Martinez, Jr.